

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

LARISSA WHITE, an individual,  
Plaintiff,

vs.

CITY OF TURNER POLICE CHIEF DON  
TAYLOR; by and through the CITY OF  
TURNER POLICE DEPARTMENT, a  
political subdivision of TURNER, OREGON  
Defendants.

Case No. 6:18-cv-00550-JR

**SUBPOENA DUCES TECUM**

**TO: Nick Hunter**  
**Marion County Sheriffs Office**  
**100 High Street NE**  
**Salem, OR 97301**

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

■ YOU ARE COMMANDED to **appear** at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

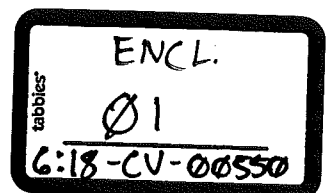
Thenell Law Group  
12909 SW 68<sup>th</sup> Parkway, Ste. 290  
Portland, OR 97223

DATE AND TIME:  
February 11, 2018 at Noon

■ YOU ARE COMMANDED to **provide copies** of all records in your custody, control, or possession including, but not limited to: See **Attached Exhibit(s)**   A  .

PLACE: Please mail the requested records to:  
**Daniel E. Thenell**  
**Thenell Law Group, P.C.**  
**12909 SW 68<sup>th</sup> Parkway, Suite 290**  
**Portland, OR 97223**

DATE AND TIME:  
By or Before January 23, 2019



☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

DATE AND TIME

PREMISES

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

**Notice to the person who issues or requests this subpoena**  
If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE: January 9, 2019

/s/ Daniel E. Thenell

Daniel E. Thenell, OSB# 971655

Email: Dan@ThenellLawGroup.com  
Of Attorneys for Plaintiff

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Daniel E. Thenell, WSBA No. 37297  
Thenell Law Group, P.C.  
12909 SW 68<sup>th</sup> Parkway, Suite 290  
Portland, OR 97223  
Trial Attorney:  
Daniel E. Thenell, OSB# 971655

Witness Fee \$ 40.00  
Mileage \$ 44.85  
TOTAL \$ 85.85  
Thenell Law Group, P.C.  
12909 SW 68<sup>th</sup> Parkway, Suite 290  
Portland, OR 97223  
Telephone: (503) 372-6450

**PROOF OF SERVICE**

DATE: January 9, 2019

Steven A. Kraemer  
Richard P. Freud  
Kraemer & Lewis  
P.O. Box 1469  
Lake Oswego, OR 97035  
Email: [skraemer@cisoregon.org](mailto:skraemer@cisoregon.org)  
Email: [rfreud@cisoregon.org](mailto:rfreud@cisoregon.org)

Via email at email(s) located above.

SERVED ON (PRINT NAME)

MANNER OF SERVICE

Laura M. Pride

Paralegal

SERVED BY (PRINT NAME)

TITLE

**DECLARATION OF SERVER**

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on January 9, 2019  
DATE

/s/ Laura M. Pride  
Laura Pride, Paralegal  
Thenell Law Group  
12909 SW 68<sup>th</sup> Parkway, Suite 290  
Portland, OR 97223

## **EXHIBIT A**

YOU ARE HEREBY COMMANDED to produce any and all records in your possession, custody, or control regarding:

YOUR COMPLETE FILE regarding Larissa White, and/or Turner Police Chief Don Taylor, and/or Turner Police Department, and/or David Sawyer from January 2015 to the present, including but not limited to:

- Correspondence
- Records
- Reports
- Bills/Invoices
- Notes
- Research

**Please obtain approval from our off for all copy fees exceeding \$100.00**

As used herein, "records, correspondence & documents" shall also include all writings, drawings, statistics, graphs and charts, pamphlets, notations of conversations or telephone calls, notes, memorandums, calendars, diaries, all correspondence including electronic mailings and other electronic media, audio and videotapes, photographs, phono-records, and other data compilations (i.e., computerized data records).

All information sought shall include production of all available formats (i.e., video, audio, transcription).